

**ASSOCIATION OF FLIGHT ATTENDANTS AFL-CIO**

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DEPT OF TRANSPORTATION

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January 19, 2001

U.S. Department of Transportation Dockets
Docket No. FAA-2000-7909 - 24
400 Seventh Street SW
Room Plaza 401
Washington, DC 20590

RE: Notice of Proposed Rulemaking (NPRM) for Improved Flammability Standards for
Thermal/Acoustic Insulation Materials Used in Transport Category Airplanes

Dear Sir or Madam:

On behalf of the Association of Flight Attendants (AFA), representing 49,000 flight attendants at 27 airlines, we are writing to comment on the proposed rule regarding improved flammability standards for thermal/acoustic insulation materials. The purpose of the proposed rule is to reduce the incidence and severity of cabin fires, and additionally, to provide an increased level of safety with respect to post-crash fires.

AFA supports the Federal Aviation Administration's (FAA) efforts to improve the flammability standards for aircraft especially those that assist in slowing the propagation of fire in the aircraft environment. The introduction of more fire resistant materials serves to reduce the possibility of fire and also increases the flight attendant's ability to evacuate an airplane. Although flight attendants receive minimal fire fighting training, we believe that a better first line of defense is to have materials in the cabin that do not propagate a fire, especially one that may start during the flight. We also support the FAA's recognition that burnthrough requirements should be proposed. Although flight attendants are trained to evacuate passengers as quickly and safely as possible in an emergency situation, a greater threat of fire is not something that we want to see added to the scenario. By delaying fire propagation and burnthrough, the flight attendants ability to successfully deal with an emergency and evacuate all passengers is greatly enhanced.

As stated above, although we support the FAA's efforts to improve flammability standards, we believe that some changes to the proposal need to be made. Our main concern with this proposal is that it would require the improved insulation for burnthrough to be placed on only the lower half of the fuselage. This degrades the effectiveness of this safety proposal.

INFLIGHT SAFETY PROFESSIONALS

INTERNATIONAL TRANSPORT WORKERS' FEDERATION



Burnthrough Protection on the Lower Half

The reason stated in the NPRM for requiring burnthrough protection on only the lower half of the fuselage was that "those areas were considered to be most susceptible to penetration to external fire." The FAA further justifies this limited protection by stating, "Although the additional costs associated with providing this same protection to the remainder of the airplane are **not great**, the benefits would be **negligible**."

The FAA has not justified limiting placement of the insulation to only the lower half of the aircraft. The Federal Aviation Act provides when prescribing a regulation, the Administrator shall consider the duty of an air carrier to provide service with the highest possible degree of safety in the public interest. 49 USC §44701(d)(1). Because the cost of this additional protection is minimal it should be put on the entire fuselage of the aircraft.

We realize that retrofit of current aircraft is not required; that the new insulation standards only apply to existing airplanes when insulating materials are replaced; and that this will be an airworthiness requirement for newly manufactured aircraft. To not require burnthrough protections around the entire fuselage is unconscionable, especially when addressing newly manufactured aircraft. There is no reason why only "half" of a newly manufactured aircraft should be protected when the entire area could be very easily protected when the thermal/acoustic insulation is initially installed.

AFA therefore believes that the improved insulation meeting the burnthrough requirements of the new Part VII of appendix F to Part 25 should be required to be placed around the entire fuselage where thermal/acoustic insulation is used.

Burnthrough Time

The proposed rule would require insulation materials to withstand a 6.0 gallon per hour burner for 4 minutes. While this is a vast improvement over the current regulation that only requires that insulation blankets comply with the basic 12-second Bunsen burner test, we believe that an even greater standard should be required. It is our understanding that there are materials available that could achieve a burnthrough time of 6 minutes. It is also our understanding that this additional protection could be achieved with a minimal cost impact over the 4 minute burnthrough limit materials. By not requiring a greater burnthrough time, especially knowing that the material is available, this proposed rule falls short of achieving the highest possible degree of safety.

Conclusion

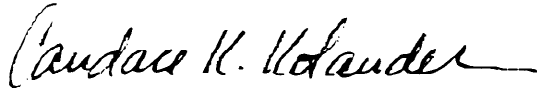
We acknowledge all the work that the FAA has put into developing these standards for the improved safety of aviation travel. But more still needs to be done. We urge the FAA to apply the new standards for flammability with these two additional requirements:

- 1) Apply the burnthrough standard to the entire aircraft, and
- 2) Increase the burnthrough time to 6 minutes.

Every second of added protection in a fire can mean that another life may be saved.

Thank you for your attention to our comments.

Sincerely,



Candace K. Kolander
Coordinator, Air Safety and Health